

UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS
2020 MAY -4 P 12:46

In re
ANDREW GREENHUT,
Debtor

IN PROCEEDINGS UNDER
CHAPTER 13
CASE NO.: 19-10782

**SUPPLEMENT TO APPLICATION BY ATTORNEY FOR THE DEBTOR
FOR COMPENSATION**

This supplement provides the additional information directed by this Court during the hearing on April 28, 2020.

1. **History of Claim (Information on Total Fees).** During October and November of 2019, Andrew incurred a total of \$12,475.29 in fees (for 27.7 hours of work at \$450 per hour) and costs associated with preparation of the Respondent's Brief on the Merits in the Supreme Court of Texas. This consisted principally of legal research and drafting work. The undersigned wrote off \$2,475.29 of that amount, to bring the outstanding balance to \$10,000.

Andrew's mother, Gloria Greenhut, agreed to pay \$4,800 toward the outstanding balance. The undersigned agreed to write off another \$5,200 and to absorb the travel costs for oral argument. The write-off and payment together discharged Andrew's \$10,000 balance.

Andrew then incurred \$13,050 in fees (29 hours at \$450 per hour), \$26.25 in costs, and \$463.58 in travel expenses associated with oral argument in the Supreme Court of Texas. This consisted principally of reviewing the briefs, reading the relevant authorities, and preparing to present the oral argument. The undersigned absorbed the travel expenses as agreed, wrote off another \$3,600 in fees, and tendered the present application for compensation of \$9,476.25.

Since tendering this application, Andrew has incurred another \$189.75 in copying costs, \$46.20 in postage, and \$40.57 in courier charges. The undersigned will write off those expenses, and does not intend to seek payment for them.

Thus, the present application will—if approved—reduce Andrew’s balance owed to \$0.

2. **Payment by Third Party.** Andrew’s mother, Gloria Greenhut, paid \$4,800 of his balance. Andrew and his mother provided sworn affidavits to the undersigned that the payment was a gift, and that Andrew will not repay it.

3. **Use of Retainer.** Assuming this Court authorizes him to do so, the undersigned intends to pay the approved fee amount by transfer of funds from his firm’s trust account to the firm’s operating account—in other words, by payment from the funds on retainer.

4. **Sum Total of Present Charges.** The amount sought in this application represents the total amount of outstanding fees to date for which the undersigned will seek compensation. If another application is made, it will be because future services were required.

5. **Possibility of Future Charges.** The undersigned cannot categorically rule out the possibility of future services associated with, for example, a motion for rehearing in the Supreme Court of Texas. Such post-opinion proceedings are rare. But they do sometimes occur. It is unlikely but possible that there would be future charges resulting in a future application.

The undersigned believes this addresses all the Court’s instructions for additional information and asks that the application be approved for \$9,476.25.

Date: April 29, 2020

/s/ Charles “Chad” Baruch, Esq.

Johnston Tobey Baruch, P.C.

Chad Baruch

State Bar No. 01864300

chad@jtlaw.com

12377 Merit Drive, Suite 880

Dallas, Texas 75251

Telephone: (214) 741-6260

Facsimile: (214) 741-6248

UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS

In re
ANDREW GREENHUT,
Debtor

IN PROCEEDINGS UNDER
CHAPTER 13
CASE NO.: 19-10782

CERTIFICATE OF SERVICE

I, Charles "Chad" Baruch, Esq., do hereby certify that I have this day served a copy of the Supplement To Application By Attorney For The Debtor for Compensation for Charles "Chad" Baruch, a copy of which is attached hereto, by mail on the persons listed below.

Date: April 29, 2020

/s/ Charles "Chad" Baruch, Esq.

Johnston Tobey Baruch, P.C.

Chad Baruch

State Bar No. 01864300

chad@jtlaw.com

12377 Merit Drive, Suite 880

Dallas, Texas 75251

Telephone: (214) 741-6260

Facsimile: (214) 741-6248

PERSONS SERVED:

Office of the United States Trustee

1184 Federal Office Building

10 Causeway Street

Boston, Massachusetts 02222-1043

U.S. Bankruptcy Court

Office of the Clerk

c/o Case Administrator

5 Post Office Square, Suite 1150

Boston, MA 02109-3945

Carolyn Bankowski, Esq.

Chapter 13 Trustee

5 Post Office Square, Suite 1000

Boston, MA 02109-3945

Barclays Bank Delaware

Attn: Correspondence

Po Box 8801

Wilmington, DE 19899

Capital One

Attn: Bankruptcy

Po Box 30285

Salt Lake City, UT 84130

Chase Card Services

Correspondence Dept

Po Box 15298

Wilmington, DE 19850

Christopher and Andrea Haas

164R Summer Street

Arlington, MA 02474

Deborah G. Hankinson, Esq.
HANKINSON, PLLC
750 N. St. Paul Street, Ste. 1800
Dallas, TX 75201

Elan Financial Service
Attn: Bankruptcy
4801 Frederica Street
Owensboro, KY 42301

Gita Srivastava
5439 Edgehollow Place
Dallas, TX 75287

Gloria and Alan Greenhut
1560 45th Street
Brooklyn, NY 11219

Harriet O'Neill, Esq.
LAW OFFICE OF HARRIET O'NEILL, PC
919 Congress, Suite 1400
Austin, TX 78701

Ike Vanden Eykel, Esq.
KOONSFULLER, P.C.
1717 McKinney Ave., Suite 1500
Dallas, TX 75202

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Israel Suster, Esq.
The Suster Law Group, PLLC
1316 Village Creek Drive, Suite 500
Plano, TX 75093

Mass. Dept. of Revenue
P.O. Box 9564
Boston, MA 02204

Rick Thompson, Esq.
KELLY, DURHAM & PITTARD L.L.P.
2223 W. Jefferson Boulevard
Dallas, TX 75208

Rtn Federal Credit Union
600 Main St

Waltham, MA 02452

Wallace B. Jefferson, Esq.
ALEXANDER DUBOSE JEFFERSON &
TOWNSEND
515 Congress Avenue, Ste. 2350
Austin, TX 78701-3562

Alex Mattera, Esq.
Partridge Snow & Hahn LLP
30 Federal Street
Boston, MA 02110

Richard Gottlieb
Law Office of Richard N Gottlieb
Ten Tremont Street
Suite 11, 3rd Floor
Boston, MA 02108

Andrew Greenhut
21 Kingston Street
Sommerville, MA 02144